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5 Attorneys for Third Party Defendant
6 ROLLS-ROYCE NAVAL
7 MARINE, INC.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 GOLDEN GATE BRIDGE HIGHWAY AND
TRANSPORTATION DISTRICT, a public
entity; and LEXINGTON INSURANCE
COMPANY, a corporation,

13 Plaintiffs,

14 v.

15 BLUE & GOLD FLEET, INC., a California
Corporation; BLUE & GOLD FLEET, L.P., a
16 Delaware limited partnership

17 Defendants.

18 CASE NO. C 10-2387 SC

19 **STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO COMPLETE ADR PROCESS**

20
AND RELATED CROSS-ACTION

21 WHEREAS pursuant to the Court's Order of April 5, 2011, the parties currently have until
22 November 30, 2011 to complete mediation;

23 WHEREAS the parties to this action filed a Joint Case Management Statement and Rule
24 26(f) Statement on June 17, 2011;

25 WHEREAS the parties agree that the deadline to complete the ADR process should be
26 continued so as to allow the parties the opportunity to conduct additional discovery regarding
27 third party practice issues that the third parties desire to conduct relating to these issues;

1 IT IS HEREBY STIPULATED and agreed that the date by which to complete mediation
2 shall be extended until December 30, 2011. Mediation is scheduled to take place on December
3 12, 2011.

4 Dated: November 22, 2011 LECLAIRRYAN LLP

5 By: _____ /s/
6 PETER M. HART

7 Attorneys for Third Party Defendant
8 ROLLS-ROYCE NAVAL MARINE, INC.
as successor to BIRD JOHNSON

9 Dated: November 22, 2011 COZEN O'CONNOR

10 By: _____ /s/
11 Kevin D. Bush

12 Attorneys for Plaintiffs
13 GOLDEN GATE BRIDGE HIGHWAY AND
TRANSPORTATION DISTRICT and
LEXINGTON INSURANCE COMPANY

15 Dated: November 22, 2011 EMARD DANOFF PORT TAMULSKI & PAETZOLD,
16 LLP

17 By: _____ /s/
James Joseph Tamulski
Talcott N. Bates

19 Attorneys for Defendant and Third-Party Plaintiff
20 BLUE AND GOLD FLEET, LP

21 Dated: November 22, 2011 GIBSON ROBB & LINDH, LLP

22 By: _____ /s/
Geoffrey Robb
Marisa G. Huber

24 Attorneys for Third-Party Defendant
25 SOUND PROPELLER SERVICES, INC.

26 ///
27 ///
28 ///

CERTIFICATE OF SIGNATURE

I, Peter M. Hart, attest that the content of this document is acceptable to all parties, and that all counsel have authorized me to sign the document on their behalf.

By:

/s/

PETER M. HART

ORDER

Good cause appearing therefore, PURSUANT TO STIPULATION, IT IS SO
ORDERED:

The date by which to complete mediation shall be extended until December 30, 2011.

DATED: 11/22/1



1
2 **CERTIFICATE OF SERVICE**
3

4
5 I hereby certify that on November 22, 2011, I electronically filed the foregoing with the
6 Clerk of the Court using CM/ECF system which will send a notification of electronic filing to the
7 following CM/ECF:
8

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23 *LEAD ATTORNEY*
24 *ATTORNEY TO BE NOTICED*

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12 Respectfully Submitted by,
13

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